



Washoe County School District

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September 8, 2026

Via email mmackedon@spcsa.nv.gov and U.S. Mail

State Charter Governing Board
State Public Charter School Authority
500 E. Warm Springs Rd., Suite 116
Las Vegas, NV 89119-4344

RE: WCSD Opposition to DANN's Request to Amend Charter School Contract

Dear Members of the Authority:

On August 25, 2026, the Washoe County School District Board of Trustees (Board), by a vote of 6–0, with one Trustee recusing themselves due to a personal conflict, formally voted to oppose the Doral Academy of Northern Nevada's ("DANN") Request for Amendment seeking approval to add a second K-12 campus, expand enrollment by approximately 1,600 students, expand into grades 9-12, establish a university-affiliated laboratory school model, and construct a new campus on approximately 25 acres of University of Nevada, Reno property. The Board's opposition is not a rejection of charter schools or the concept of educational choice; rather, it reflects our considered concerns regarding this application and its potential implications for our students, our schools, the legal sufficiency, financial feasibility, public accountability, educational justification for the proposed expansion, and the responsible stewardship of public education resources.

This proposal is not a routine amendment. It represents one of the most significant charter expansions proposed in Northern Nevada in recent years. At full build-out, DANN projects enrollment ranging from approximately 1,570 to 1,596 students at the new campus alone, potentially reaching approximately 1,755 students if enrollment operates at 110 percent of authorized capacity. Combined enrollment across the DANN network could exceed 2,500 students, representing an increase of more than 150 percent over current enrollment levels. The proposal is supported by a capital project estimated at \$50 million to \$55 million and annual debt service obligations estimated at approximately \$3.8 million.

Because of the magnitude of the proposed expansion, the SPCSA should insist upon strict compliance with every procedural, statutory, regulatory, financial, and accountability requirement before considering approval. The Board submits that DANN has failed to meet that burden.

I. DANN Did Not Meet the Mandatory Procedural Requirements to Submit an Amendment to the SPCSA.

The Board's primary concern is that DANN has not demonstrated compliance with fundamental procedural requirements governing charter amendments.

NAC 388A.400(1) requires SPCSA-sponsored charter schools seeking amendments to submit a written notice of intent to the SPCSA 45 days before the amendment request itself is filed. The regulation exists for a straightforward reason: stakeholders, affected school districts, and the public should receive meaningful notice regarding the nature and scope of a proposed amendment before the amendment review process begins. NAC 388A.400 does not require SPCSA-sponsored schools to provide a similar type of notice to school boards. However, throughout June 2026, WCSD repeatedly requested information from the SPCSA regarding DANN's expansion efforts. Specifically, WCSD requested emails, notices, communications, amendment information, and documentation reflecting DANN's plans to expand in Washoe County. Despite those requests, WCSD was not informed that any qualifying notice of intent had been submitted and was instead informed that only informal conversation about a learning lab partnership occurred. Only after WCSD publicly questioned the procedural adequacy of the amendment process in its publicly posted materials did the SPCSA inform the WCSD that a document submitted in April 2026 satisfied the notice requirement.

After reviewing that document, WCSD does not believe it constituted a legally sufficient notice of intent to amend DANN's charter contract. Rather than identifying a proposal to add a second K-12 campus, increase enrollment by approximately 1,600 students, develop a multi-campus charter network, or construct a \$50-\$55 million facility, the document primarily describes a potential UNR partnership and laboratory-school concept. It does not meaningfully disclose the specific amendments ultimately sought by DANN, and in fact does not even mention the words "notice" or "intent" or "amendment." Thus, it failed to comply with the mandatory notice of intent to file an amendment contemplated by NAC 388A.400.

A notice requirement has meaning only if it actually provides notice. Such notice is mandatory in the law and cannot be disregarded. The April 2026 email and attachments contained no clear notice of intent that reflected the scope of the ultimate request for amendment or even mentioned an intent to amend at all. The SPCSA should not allow a generalized concept document regarding a possible future affiliation with UNR to satisfy a mandatory prerequisite intended to notify the public of one of the largest charter expansion proposals in Northern Nevada.

II. DANN Has Not Demonstrated Good Cause for the Amendment.

DANN's request is also premised on a claim that "good cause" exists to permit consideration outside of the normal amendment cycle. Yet DANN's own application undermines that assertion. As an initial matter, in February 2026, the SPCSA updated its own regulations, amending NAC 388A.400 to remove the amendment cycle deadlines. However, this regulatory amendment kept in place the good cause showing requirement when filing an amendment (as well as maintained the requirement to file a notice of intent to amend 45 days prior to the amendment). Thus, the good cause showing requirement is still required under law and SPCSA must analyze whether this amendment meets the higher threshold of a good cause showing.

For purposes of evaluating the substantive justification for an expansion, good cause can reasonably be understood as a fact-specific showing of a legitimate, reasonable, and sufficiently compelling justification for the requested action, supported by evidence rather than convenience or preference, and demonstrating that granting the request is consistent with the governing statutory and regulatory standards and the policy considerations behind Nevada's charter-school framework.

More specifically, in the context of a charter-school expansion, good cause for expansion exists when the charter school demonstrates, through objective and credible evidence, a legitimate educational or operational need for the proposed expansion and establishes that it has the academic performance, financial capacity, organizational capability, and governance structure, alongside a comprehensive plan to acquire and finance the necessary facilities and staff to implement the expansion successfully without materially impairing its existing program or students.

This formulation is consistent with the substantive criteria imposed by Nevada law. NRS 388A.276 requires the sponsor, when considering an amendment to a charter contract, to consider the academic, financial, and organizational performance of the charter school and other schools operated by its current or proposed operators. For certain expansions involving additional facilities, NRS 388A.279 further requires denial where the school fails to satisfy applicable academic, financial, or organizational performance standards or where the governing body lacks a "comprehensive and feasible plan to operate additional facilities."

Good cause is not satisfied merely because a charter school desires to expand, has identified a desirable geographic market, wishes to increase enrollment, or believes expansion would benefit the organization. A meaningful good-cause showing requires an objective factual basis demonstrating both a legitimate justification for the requested expansion and the school's capacity to carry it out successfully. Most importantly, good cause requires establishing a community need that does not currently exist.

This distinction is particularly important because Nevada law does not create an entitlement to a charter amendment simply because the proposed expansion is legally permissible. NRS 388A.276 provides that the sponsor and governing body "may amend" the charter contract and expressly requires consideration of the school's academic, financial, and organizational performance and denial if those are deficient. Thus, the inquiry is not merely whether expansion is permissible, but whether the evidence presented provides a sufficient factual and substantive basis for the sponsor to exercise its discretion to approve the requested amendment.

The application acknowledges that discussions concerning the proposed expansion began no later than early 2025 and continued through multiple board meetings, negotiations, and planning efforts throughout 2025 and 2026. The proposed UNR affiliation, lease negotiations, and laboratory-school concept have therefore been under consideration for approximately eighteen months.

Yet DANN identifies no emergency, no imminent financial hardship, no statutory deadline, no pending contractual penalty, and no immediate operational necessity that would justify bypassing the ordinary amendment process. To the contrary, DANN's own timeline demonstrates that the proposed campus is not expected to open until the 2028-2029 school year and remains subject to years of additional planning, engineering, permitting, entitlement, financing, and construction activity. If routine negotiations and long-term planning efforts are sufficient to establish good cause, then virtually every charter school seeking expansion could avoid a high threshold of establishing good cause in the amendment process. That cannot be the purpose of the regulation. Instead, the purpose is to show that all the amendment requirements are met, particularly an unmet community need, which the following sections of this letter will show that the DANN amendment has failed to establish these critical and mandatory requirements.

The Board respectfully submits that DANN has failed to establish the good cause necessary to justify this amendment request and therefore the request must be denied.

III. Failure to Comply with NAC 388A.400(9) Requires Denial.

The DANN application fails to address four of the five mandatory requirements in NAC 388A.400(9) and therefore must be denied on these grounds alone. NAC 388A.400(9) is not an aspirational guideline that may be addressed after approval. It is the regulation specifically governing the conversion of a single-campus charter school into a multi-campus charter school, which is precisely what DANN is seeking through this amendment. The regulation expressly provides that SPCSA will not approve such an amendment unless the required conditions are included in the charter contract. Those requirements are therefore prerequisites to approval, not issues to be addressed by DANN later.

A contrary interpretation permitting amendment applications to forego the requirements of NAC 388A.400(9) and allow the SPCSA to approve amendments on the condition of future compliance produces an absurd result. Under that approach, a charter school could seek approval for a multi-campus expansion without demonstrating compliance with any of the requirements imposed by NAC 388A.400(9), obtain approval, and only afterward decide whether to implement those requirements. Such a reading effectively nullifies the regulation by allowing SPCSA to approve a project before receiving the very information necessary to determine whether the proposal complies with law. If the regulation identifies requirements that must be satisfied, those requirements necessarily must be evaluated during the amendment process itself. Otherwise, the regulation serves no purpose because there is no "look back" provision by the SPCSA; all decisions by the SPCSA are "final" under NAC 388A.400(12).

DANN's application illustrates exactly why these requirements matter. NAC 388A.400(9)(b) requires a distinct academic leader for each campus, yet DANN proposes that the current DANN Principal serve as both the founding principal of the new campus and the system leader over both campuses. The regulation requires separate leadership; the application proposes shared leadership. Likewise, the regulation requires a matriculation policy governing movement between campuses,

but DANN acknowledges that such a policy would be developed at some point in the future. A required policy that does not yet exist cannot form the basis for regulatory compliance.

The amendment also fails to demonstrate compliance with the requirement for separate student applications and lottery processes for each campus. Instead, DANN indicated that lottery priorities would mirror those of the existing campus, suggesting a common enrollment structure rather than the separate campus-specific process contemplated by the regulation. Similarly, WCSO's review identified no provision granting SPCSA the authority to reconstitute, restart, or close individual campuses separately, despite being expressly required by NAC 388A.400(9)(b).

In short, DANN appears to satisfy only one of the five substantive requirements identified in NAC 388A.400(9)(b): identifying the name, location, and grade levels of the proposed campus. The remaining requirements are either absent, incomplete, or deferred for future consideration. That is not substantial compliance. Because the regulation expressly conditions approval on inclusion of these provisions in the charter contract, SPCSA cannot lawfully treat them as afterthoughts. To do so would deprive both SPCSA and the public of the information necessary to evaluate the legality, governance structure, and accountability framework of the proposed expansion before approval is granted. For that reason alone, the amendment should be denied.

IV. DANN Has Not Demonstrated a Genuine Need for Expansion.

Nevada's statutory and regulatory framework requires the SPCSA to consider the educational and demographic needs of the community when exercising its discretion over a material charter-school expansion. NRS 388A.220 requires the SPCSA to annually evaluate pupil demographics, academic needs, and the needs of at-risk pupils throughout the State. NRS 388A.223 expressly identifies meeting the "identified educational needs of pupils" as a fundamental component of the sponsor's responsibilities and requires the sponsor to establish criteria for approving charter contract amendments, including distinct criteria for amendments that are material or strategically important.

NRS 388A.279 treats substantial enrollment increases and acquisition of an additional facility for purposes of expanding enrollment as amendments that cannot occur without affirmative sponsor approval. The regulations reinforce that this is a substantive review: NAC 388A.320 requires a charter school seeking an additional facility to provide any information prescribed by its sponsor, and NAC 388A.410 authorizes the SPCSA to impose additional conditions when approving an amendment involving additional facilities. Read together, these provisions demonstrate that expansion is not an entitlement merely because an existing charter school is academically or financially capable of growing; it is a discretionary decision that must be considered within the broader statutory framework and requires SPCSA to identify and respond to Nevada's educational and demographic needs.

Accordingly, whether a proposed expansion addresses an unmet community or educational need is a material consideration in evaluating an amendment request. If the affected community is experiencing declining enrollment, existing public schools have substantial available capacity, and the charter applicant cannot demonstrate unmet demand, a shortage of educational options, an

underserved student population, or another identified educational need that the expansion would address, those facts weigh directly against approval. To disregard that evidence and evaluate the amendment solely on the operator's ability to successfully open and operate another campus would effectively divorce the expansion decision from the needs assessment that the Legislature requires SPCSA to undertake and from the statutory purpose of authorizing charter schools that meet identified educational needs. Thus, while Nevada law does not use the precise phrase "unmet community need" as an express prerequisite to every expansion amendment, the statutory scheme provides a strong basis for requiring SPCSA to meaningfully consider whether additional charter capacity actually responds to an identified educational or demographic need before approving a material expansion.

Thus, Nevada's charter school framework does not contemplate expansion for expansion's sake. A charter amendment proposing the addition of a new campus, substantial enrollment growth, and expansion into new grade levels must demonstrate that the proposal responds to an actual educational or community need and is supported by a comprehensive and feasible plan. Yet DANN's application repeatedly relies on broad assertions of "sustained unmet enrollment demand" and a need for "innovative and career-connected learning opportunities" without providing meaningful evidence supporting either claim. DANN's 180- page request for amendment provided no supporting data or sources to substantiate those foundational assertions. The absence of such evidence is particularly significant because DANN is seeking approval to add approximately 1,600 new student seats through one of the largest charter expansions proposed in Northern Nevada. When an applicant claims an unmet need as the justification for expansion, the burden should rest with the applicant to demonstrate that the need actually exists. DANN has failed to do so.

Just as importantly, DANN identifies a need for "more innovative and career-connected learning opportunities" as a rationale for its proposed expansion. However, DANN's application largely ignores the extensive academic, career, and choice opportunities already available—and in many respects exceeded—to students within WCSO. WCSO currently provides more than 4,585 Advanced Placement enrollments, 4,186 dual-credit enrollments, and 589 International Baccalaureate enrollments, as well as STEM academies, early-college programs, UNR and TMCC partnerships, comprehensive Career and Technical Education pathways, aviation programs, engineering programs, biomedical pathways, teacher-preparation pathways, dual language programs, and more than 100 internship and work-based learning opportunities. In addition to dual/college credit enrollment options at all of WCSO high schools, WCSO's Debbie Smith CTE Academy and the Academy of Arts, Careers and Technology (AACT) are designed to ensure students graduate prepared for success in either college or a career. Students receive rigorous academic instruction alongside career-focused, hands-on learning that allows them to develop practical skills, explore career pathways, and gain experience aligned with postsecondary opportunities. Through industry-recognized credentials, advanced coursework, and exposure to high-demand professions, these programs provide students with meaningful options after graduation—whether they choose to pursue a college degree, additional technical training, an apprenticeship, or enter the workforce. The newly reconstructed Vaughn Middle School, which opened in August 2026, includes advanced STEM labs, robotics areas, dedicated creative makerspaces, collaborative student hubs, and integrated observation areas supporting a partnership

with UNR to train future educators. Vaughn also offers the IB Middle Years Programme and Dual Language programming. Students throughout the district can also access all the foregoing specialized programming through WCSD's School of Choice framework, which expands opportunities beyond traditional attendance boundaries. DANN's application does not explain why these existing offerings are inadequate or how its proposed laboratory-school model provides educational opportunities for students unavailable elsewhere. Instead, it simply assumes that additional opportunities are needed while overlooking the extensive programs already serving students across the community.

The application also ignores the fact that WCSD-sponsored charter schools already serve many of the very specialized educational niches that charter schools attempt to address. For example, Mariposa Language and Learning Academy provides a unique language-focused educational model; Coral Academy operates multiple STEM-focused campuses serving students interested in science, technology, engineering, and mathematics; ACE High School provides Career and Technical Education pathways; EnCompass Academy provides alternative and personalized learning options; and other district-sponsored charter schools offer Montessori, language immersion, and specialized instructional approaches. These schools exist because they address distinct educational needs within the community. DANN, by contrast, has not demonstrated what unmet need remains after accounting for existing district schools, existing charter schools, School of Choice opportunities, advanced academic programs, dual-credit pathways, CTE academies, and university partnerships already available to Washoe County families.

Equally important, DANN's proposal is difficult to reconcile with the extraordinary level of public investment already committed to this region by Washoe County taxpayers. Through WC-1, Washoe County voters authorized significant investments to modernize educational facilities, improve student learning environments, and ensure that public-school infrastructure meets the needs of current and future generations. Unlike facilities constructed on privately leased land, WCSD schools are publicly owned assets that remain permanently available for the benefit of students, taxpayers, and the community.

In the area surrounding the proposed DANN expansion, WCSD has already committed hundreds of millions of taxpayer dollars toward new facilities, replacement schools, and major modernization efforts. These projects include the construction of a new elementary school serving the Neil Road community, the replacement of Echo Loder Elementary School, the modernization of Booth Elementary School, the reconstruction of Wooster High School, the reconstruction of Vaughn Middle School completed and opened during the 2026-2027 school year, and other significant capital investments planned throughout the region. Collectively, these projects are part of an approximately \$600 million investment strategy approved by the Board of Trustees and currently underway.

These investments have also required difficult but necessary decisions regarding district facilities. As part of WCSD's long-range facilities planning process, the Board has approved the closure and consolidation of several schools, including Pine Middle School, Corbett Elementary School, Veterans Elementary School, Smithridge Elementary School, and Dodson Elementary School.

These decisions were made after extensive public discussion and were intended to concentrate resources, improve educational opportunities, modernize aging facilities, and ensure efficient stewardship of taxpayer funds.

Against that backdrop, DANN seeks approval to construct a separate \$50-\$55 million facility in the same area while providing little explanation for why existing public investments are insufficient to meet future demand. SPCSA should carefully consider whether approving a large-scale charter expansion that duplicates capacity in a region already receiving substantial taxpayer-funded facility investments is consistent with the efficient use of public resources. The existence of significant available and planned public-school infrastructure weighs strongly against a finding that an additional 1,600-seat campus is necessary to meet community needs.

DANN's own enrollment and demographic data undermine its claim that it is needed to serve underserved populations. The application proposes outreach to students attending lower-performing schools and to diverse communities, yet DANN currently serves English Learners and students with disabilities at significantly lower rates than WCSO. While the application projects future increases in those populations, it provides little explanation regarding how those students will actually be recruited, enrolled, and served. An applicant cannot establish unmet community need merely by identifying underserved populations; it must also demonstrate that it is prepared to effectively serve those populations. Here, DANN has not meaningfully done so. The result is an amendment application that asserts need, but never proves it.

The academic-performance data surrounding the proposed campus location further undermines the assertion that this expansion addresses an unmet educational need. DANN's application repeatedly references lower-performing schools within portions of ZIP code 89502 as justification for expansion. However, the immediate area surrounding the proposed campus site on the corner of Pembroke Drive and Veterans Parkway is already served by some of the highest-performing public schools and charter schools in Northern Nevada and, in many cases, throughout the State of Nevada.

DANN emphasizes that approximately 85.5% of students in ZIP code 89502 attend one- or two-star schools and relies upon that statistic as a primary justification for expansion. However, the schools identified as one- and two-star schools within the immediate area are overwhelmingly Title I schools serving some of the District's highest-needs student populations, including:

- Hidden Valley Elementary School, Title I, 2 Stars
- Mariposa Academy Charter School, Title I, 2 Stars
- Booth Elementary School, Title I, 1 Star
- Echo Loder Elementary School, Title I, 2 Stars
- Vaughn Middle School, Title I, 1 Star
- Wooster High School, Title I, 2 Stars

Yet, the proposed campus is not strategically designed around serving these Title I communities. Instead, the proposed location is surrounded by numerous four- and five-star schools, including

2025 Nevada School Performance Ratings

- 1 Star (5 Schools)
- 2 Stars (5 Schools)
- 3 Stars (2 Schools)
- 4 Stars (1 Schools)
- 5 Stars (6 Schools)

Map Labels:

- 89503 MOUNTAIN VIEW
- 89523
- 89509 SKYLINE BOULEVARD
- 89519
- 89511
- 89431
- 89434
- 89521
- 89502
- Booth ES
- Vaughn MS
- Loder ES
- Bailey Charter School
- Pine MS
- Donner Springs ES
- Coral Academy High School
- Coral Academy of Science Elementary School South
- Academy for Career Education
- Wooster HS
- AACT
- Mariposa Dual Language Academy
- Dodson ES
- Hidden Valley ES
- Depoali MS
- Poulakidas ES
- Double Diamond ES
- Damonte Ranch HS
- Raw ES
- Brown ES

Because charter school enrollment is not restricted by attendance boundaries, the relevant question is not whether isolated lower-performing schools exist somewhere within the broader ZIP code, but whether students in this region currently lack access to high-quality educational opportunities. The available evidence demonstrates the opposite. Families in the immediate vicinity of the proposed campus already have access to numerous highly rated district schools, district-sponsored charter schools, School of Choice opportunities, and the existing DANN campus itself.

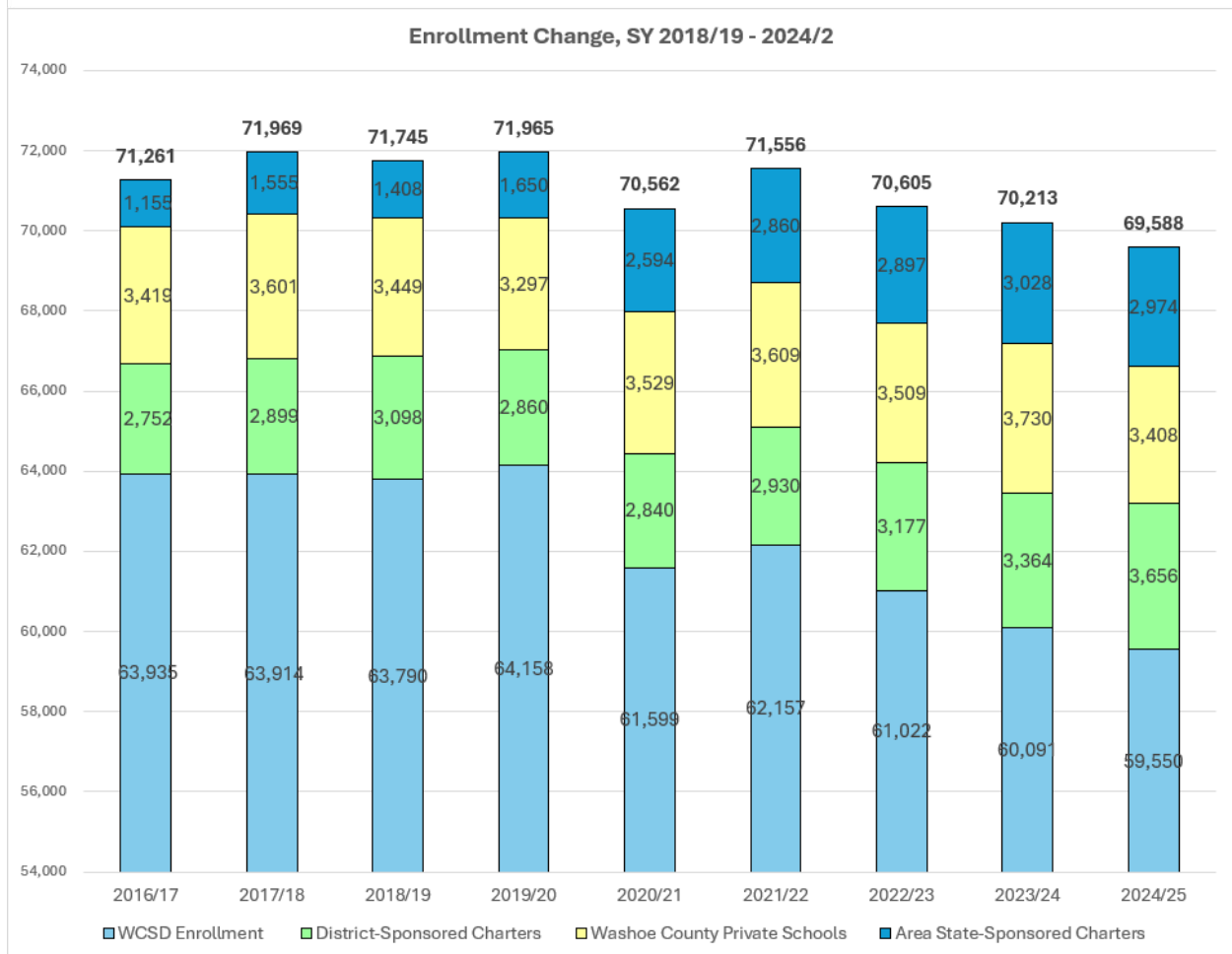
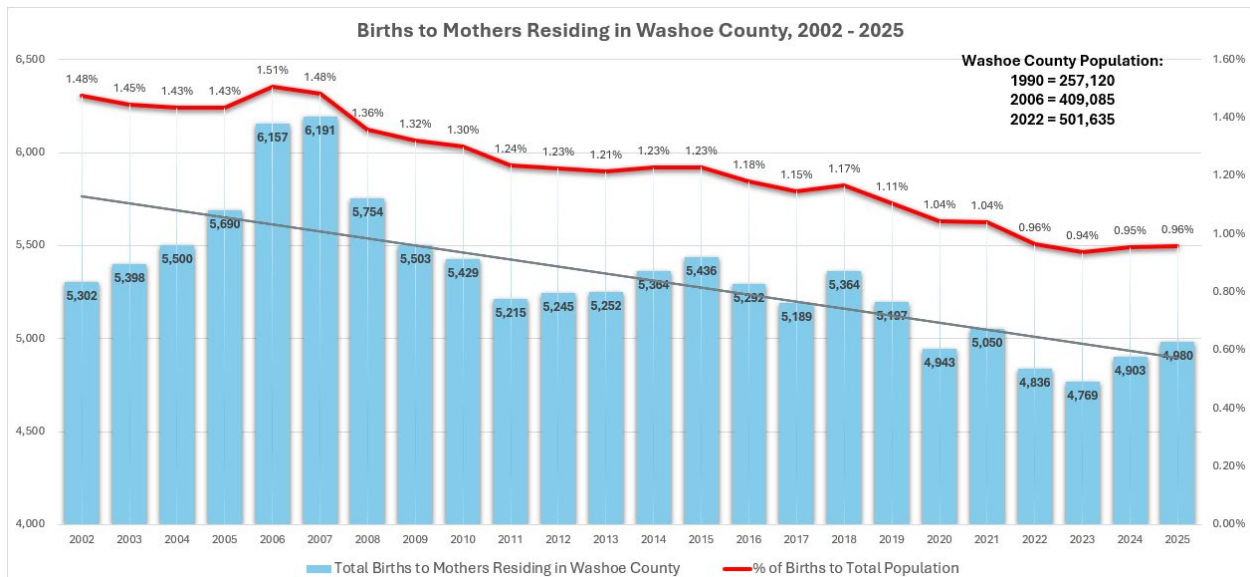
While some nearby schools continue to face significant challenges and deserve continued support and investment, the presence of several one-star and two-star schools does not establish that an additional 1,600-seat charter campus is necessary. Rather, the academic landscape surrounding the proposed site reflects a community already served by a broad spectrum of educational options, including many of Nevada's highest-performing public schools. Accordingly, the academic-performance data does not support the conclusion that the proposed expansion is needed to address a deficiency in educational opportunities.

Because the record demonstrates that Washoe County already provides extensive academic choice, career-connected learning opportunities, specialized district programs, multiple charter options, and significant investments in the very communities DANN seeks to serve, SPCSA cannot reasonably conclude that DANN has established the unmet educational need necessary to justify an expansion of this magnitude.

V. Financial Feasibility and Operational Risks Weigh Heavily Against Approval.

The financial and operational risks associated with DANN's proposal are substantial and, in many respects, unprecedented for a project of this nature. DANN seeks approval for a new 100,000-square-foot campus on approximately 25 acres of UNR property, with projected construction costs between \$50 million and \$55 million and annual debt service obligations of approximately \$3.8 million over an assumed 30-year financing term. Yet the application is built upon a series of optimistic assumptions regarding enrollment growth, construction costs, financing, and future revenues that have not been independently validated. DANN's proposal contains several concerns regarding projected revenues, including assumed growth in English Learner funding, special education funding, interest income, and a projected pre-K revenue stream despite the application not identifying any pre-K program.

The greatest risk to the project's financing is whether DANN's enrollment projections will materialize, because failure to achieve projected enrollment would place substantial strain on the school's ability to service its debt. DANN's enrollment assumptions are especially troubling given the demographic realities facing public education nationwide and in Washoe County. DANN's application is premised upon "sustained unmet enrollment demand," yet Washoe County has experienced and continues to experience consistent declines in births, district enrollment, and regional enrollment trends. DANN proposes to add between 1,570 and 1,596 new seats, with board discussions indicating enrollment could reach as high as 1,755 students. Combined with the recently approved Mater Academy expansion, the two Academica-affiliated schools alone could create capacity for more than 2,500 additional students. Without verifiable waitlist data, it is impossible to evaluate whether these enrollment projections are realistic. Building a \$55 million facility based upon speculative enrollment growth during a period of declining birth rates and enrollment trends creates obvious financial risk that ultimately Nevada taxpayers must shoulder.



The proposal also appears to significantly underestimate construction and development risks. DANN projects costs of approximately \$500 to \$550 per square foot, while WCSD's recent elementary school projects have experienced actual costs ranging from approximately \$650 to \$750 per square foot which goes through the mandatory public works process in Nevada law. Additionally, the application acknowledges numerous unresolved issues, including traffic improvements, utility extensions, grading, drainage, floodplain mitigation, environmental review, and approvals from multiple local, regional, state, and potentially federal agencies. DANN's construction schedule is highly aggressive and accepts a great deal of risk. Despite these uncertainties, DANN has not submitted completed designs or engineering plans and has not demonstrated that the proposed budget adequately accounts for potential escalation costs or permitting delays.

The location itself presents additional concerns that further undermine the financial feasibility of the project. The proposed campus is located on approximately 25 acres of UNR's Agricultural Experiment Station property, an area that remains agricultural land and is identified in the application as presenting "floodplain considerations." DANN itself acknowledges that floodplain conditions may increase project costs, yet the application provides little detail regarding the extent of any required mitigation, grading, drainage improvements, flood-control infrastructure, or permitting obligations associated with building in such an area. Construction in flood-prone or agriculturally sensitive areas routinely carries additional engineering, environmental, and infrastructure costs that are often not fully known until detailed design work is completed.

Moreover, the proposal contemplates extensive coordination with numerous local, regional, and potentially federal agencies concerning drainage, flood-control, utilities, access, and transportation improvements. These factors not only increase the likelihood of cost overruns and project delays, but also raise legitimate long-term concerns regarding operational resiliency, safety, and maintenance costs. At a minimum, they introduce significant uncertainty into a project that is already dependent upon aggressive enrollment assumptions, substantial debt financing, and an ambitious construction schedule. The practical reality is that building a \$50-\$55 million school on agricultural land within or adjacent to a floodplain is inherently more expensive, more complex, and riskier than constructing a comparable facility on a fully entitled and developed educational site.

Perhaps most concerning is the underlying land lease structure itself. Under the negotiated agreement with UNR, DANN proposes to spend more than \$50 million of public education funding and debt financing to construct improvements on land it does not own. The lease has an initial term of 20 years with three optional 10-year extensions, but there is no obligation for those extensions to be granted. DANN must pay annual rent beginning at \$75,000 plus annual escalators, must complete the project within strict timelines or face default, and, most importantly, has no option to purchase the property. Under the lease terms, the improvements ultimately become the property of UNR if DANN defaults or when the lease terminates. In other words, DANN is asking SPCSA to approve a structure in which taxpayer-funded educational dollars will finance construction of a \$50-\$55 million facility that DANN will never own, will never acquire, and that will ultimately become university property despite decades of public investment. Few public entities would

voluntarily commit taxpayer funds to construct a facility under circumstances where ownership is permanently surrendered, yet that is precisely what this proposal contemplates.

When viewed collectively, the risks associated with declining enrollment trends, uncertain demographic projections, use of debt financing, potential construction-cost escalation, floodplain and agricultural-site development challenges, the absence of any ownership interest in the completed facility, and the lack of transparency surrounding millions of dollars in future payments to a private for-profit management company create a level of financial uncertainty that should give SPCSA significant pause. Public education dollars should be invested in facilities and programs that maximize long-term value for students and taxpayers. Here, DANN proposes to spend more than \$50 million constructing a facility on leased land that it will never own, while simultaneously assuming decades of debt obligations based on enrollment projections that have not been independently verified. That is not a prudent use of taxpayer resources and does not represent the type of comprehensive and financially feasible plan contemplated by Nevada law.

The financial relationship between DANN and Academica Nevada, DANN's for-profit Educational Management Organization (EMO), and the larger Academica corporation based in Florida raises significant concerns regarding taxpayer stewardship, transparency, and public accountability. According to DANN's own projected budget, annual management fees paid to Academica are expected to increase from approximately \$493,614 in FY 2026-27 to \$964,504 in the first year of the new campus, then grow to \$1,095,054 and ultimately \$1,241,568 annually by FY 2030-31. In other words, SPCSA is being asked to approve an amendment that will result in more than \$1.2 million per year in public education funds being directed to a private, for-profit Florida-based management organization. These payments are in addition to other Academica-related services and costs that may be embedded elsewhere in the budget.

The financial concerns are compounded by the continuing role of Academica as a prevalent EMO. Public reporting indicates that approximately \$25.5 million annually flows from Nevada charter schools to EMOs, with roughly \$12 million annually being paid to Academica alone. Yet despite the enormous amount of public funding flowing through these organizations, taxpayers and regulators have limited visibility into their books, records, expenditures, compensation arrangements, affiliated entities, and related-party transactions. Unlike WCSD, which operates with publicly available budgets, audits, procurement requirements, open meetings, and public records obligations, Academica remains a private for-profit corporation whose financial operations cannot be meaningfully scrutinized by the public.

These concerns are no longer merely theoretical. The Nevada Legislative Auditor recently concluded that SPCSA "did not provide adequate oversight and guidance regarding charter school and EMO contract provisions and payments" and found that all five charter schools reviewed had missing, inappropriate, or conflicting EMO contract provisions. The audit identified inaccurate financial reporting, failures to disclose payments, deficiencies involving ownership of publicly funded property, inadequate controls over state funds, and significant discrepancies between reported management fees and actual payments. Auditors further reported that charter schools made nearly \$15.5 million in management fee payments to EMOs while reporting lower numbers

publicly, and identified nearly \$1.9 million in additional payments to EMOs and affiliated entities that were not properly disclosed. The audit specifically concluded that better oversight of charter school and EMO contracting practices is necessary and that existing deficiencies create risks of noncompliance, unfavorable contract provisions, and misappropriation of public education funds. It should be noted that DANN's own financial projections reveal that annual management fees paid to Academica Nevada will increase from approximately \$493,614 to \$1,241,568 per year, representing an increase of nearly \$748,000 annually, or more than 151%. Over the five-year projection period alone, DANN anticipates paying more than \$4.29 million in taxpayer funds to Academica.

Particularly troubling are the audit findings regarding the use of public funds by certain charter schools and EMOs. Auditors identified payments involving golf-related expenses, bonuses, reimbursements routed through affiliated companies, state education funds deposited into out-of-state bank accounts, and even approximately \$20,000 spent on a week-long cruise for school leadership personnel. The audit further found instances where schools paid hundreds of thousands of dollars to companies affiliated with their EMOs and identified a school that paid nearly \$1 million in additional reimbursements outside of reported management fees.

Against that backdrop, approving one of the largest charter expansions ever proposed in Northern Nevada would be premature and financially irresponsible. Before authorizing a project that would dramatically increase the amount of taxpayer money flowing through a private management structure, SPCSA should first demonstrate that existing audit findings have been fully addressed, that meaningful transparency exists regarding all Academica-related payments, and that the public can confidently determine where its money is going. Instead, SPCSA is being asked to approve a project that combines speculative enrollment growth, substantial debt financing, extensive construction risks, a financially one-sided lease arrangement that will result in at a minimum \$55 million of dedicated public K-12 funds being relinquished to higher education, and millions of future dollars flowing to a private for-profit entity whose finances remain largely shielded from public scrutiny. For these reasons, which are mandatory subjects for denial, the financial feasibility and operational sustainability of DANN's proposal remain highly questionable and weigh strongly in favor of denial.

VI. Failure to Demonstrate Meaningful Service to Special Populations

Finally, and perhaps most troubling, DANN's application repeatedly claims that the proposed campus will serve underserved students, students attending lower-performing schools, and diverse student populations residing within ZIP code 89502. The application emphasizes that approximately 85.5% of students in the 89502 ZIP code attend schools rated one or two stars, and relies heavily on that statistic as justification for the expansion. Yet the application provides little evidence that DANN currently serves, or is prepared to serve, the student populations that characterize that community.

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The record demonstrates a significant disconnect between the populations DANN claims it intends to serve and the populations it currently enrolls. WCSO serves approximately 16.7% students with disabilities and 15.2% English language learners (ELL), while DANN's current enrollment is comprised of approximately 10.34% students with disabilities and only 1.2% ELLs. DANN's English Learner population is only a fraction of that served by WCSO and bears little resemblance to the demographics of the community it now claims is underserved. A school cannot establish community need merely by identifying vulnerable populations in a geographic area. It must demonstrate a realistic and comprehensive ability to recruit, enroll, support, and successfully educate those students. Here, DANN has not done so.

The application's staffing plan further underscores these concerns. Despite proposing a campus that will ultimately enroll approximately 1,570 students, including students from communities identified as economically disadvantaged and historically underserved, the projected staffing model includes only a single ELL Coordinator and contains remarkably limited discussion regarding bilingual services, newcomer supports, targeted interventions, or programming designed specifically for ELLs. Likewise, the application provides little detail regarding specialized programming for students with significant disabilities, students requiring intensive behavioral support, or students requiring higher levels of special education services. Instead, the application relies largely on generalized assurances that services will be provided. General assurances are not a substitute for a detailed operational plan. SPCSA should expect far more than aspirational statements when evaluating whether a proposed expansion can effectively serve high-needs students.

The application's academic model raises similar concerns. Much of DANN's narrative focuses on dual-credit opportunities, laboratory-school research initiatives, university partnerships, internships, mentorships, advanced coursework, teacher-training opportunities, and collegiate pathways. While those opportunities may benefit many students, to which the WCSO already serves those same interests and provides greater opportunities, they are not substitutes for robust intervention services, language-acquisition programming, intensive special education supports, or programs designed for students performing significantly below grade level. The students attending one- and two-star schools in the surrounding area often require substantial academic intervention, wraparound services, social-emotional supports, and language-development services before they can meaningfully participate in advanced academic opportunities. Yet the application contains comparatively little discussion of how those foundational needs will be met.

This omission is particularly important because SPCSA's responsibility is not simply to approve charter growth. SPCSA has a statutory and regulatory duty to ensure that charter schools serve the public interest and that expansions are responsive to identified demographic and community needs. A charter school should not be permitted to justify expansion based upon the existence of underserved populations while presenting a program primarily designed around students who are already academically successful, highly engaged, and positioned to benefit from advanced course offerings already offered in WCSO. Public schools are expected to serve all students who arrive at their doors, including students with disabilities, English learners, students experiencing homelessness, students requiring intensive interventions, and students who may be performing

years below grade level. SPCSA should hold new and expansion charter school applicants to the same expectations.

Ultimately, DANN's application asks SPCSA to conclude that a new campus is necessary because thousands of students in the surrounding community attend lower-performing schools. Yet the application does not demonstrate how DANN will successfully recruit those students, show that DANN currently serves comparable populations, nor provide a sufficiently detailed plan for meeting the substantial instructional and support-service needs those students often require. Without such evidence, SPCSA cannot reasonably conclude that the proposed expansion will serve the broader community. Instead, the record suggests that the proposal will primarily attract families with high-performing children who are already actively seeking educational alternatives. That outcome would be inconsistent with the principle that public charter schools exist to expand opportunity for all students, not merely those who have the least needs or are the least costly to educate.

VII. Conclusion.

Ultimately, the question before SPCSA is not whether DANN is a successful charter school, whether partnerships with UNR are valuable, or whether laboratory schools can be innovative educational models. The question is whether this amendment application satisfies the legal, financial, operational, and public-interest standards required for approval. The record demonstrates that it does not. DANN has failed to establish compliance with critical regulatory requirements governing multi-campus charter schools, failed to provide a legally sufficient notice of intent, failed to demonstrate good cause, failed to prove an unmet educational need, failed to provide verifiable evidence supporting its enrollment projections, failed to adequately address service to English Learners and students with disabilities, and failed to present a financially prudent plan for investing more than \$50 million of taxpayer-supported resources into a facility it will never own.

Just as importantly, SPCSA's obligation extends beyond evaluating whether DANN can expand. SPCSA's statutory responsibility is to protect students, ensure accountability, safeguard public resources, and verify that charter growth serves the needs of the entire community. That responsibility is particularly significant in this case because Washoe County taxpayers have already committed approximately \$600 million toward rebuilding, modernizing, and consolidating schools within the very communities the proposed expansion seeks to serve, creating publicly owned educational assets that will remain available to students and taxpayers for generations to come. That responsibility is particularly important where an applicant relies upon claims that it will serve underserved students, yet currently serves substantially lower percentages of English learners and students with disabilities than the surrounding community. It is particularly important where an applicant seeks approval for a project dependent upon aggressive enrollment assumptions during a period of declining birth rates and declining student populations. And it is particularly important where millions of additional taxpayer dollars will flow through a private management structure at the same time Nevada's own auditors have identified significant concerns with EMO largesse and the stewardship of public funds.

At the same time, we respectfully acknowledge DANN as a high-performing school with experienced administrators and recognize the important role that quality charter schools can play in providing families with meaningful educational choices. Indeed, the WCSD itself recognizes the importance of choice through its School of Choice program and sponsoring 8 charter schools, one of which has several campuses, in Washoe County. However, DANN's academic performance, while commendable, should not supersede or diminish the substantive concerns outlined in this letter.

We also want to be clear that our opposition is not rooted in a fear of competition. We recognize that many students in our community will continue to attend traditional public schools, and given that it is important for all Nevada public school boards, including the SPCSA maintain responsibility to ensure that those schools remain strong, stable, and adequately resourced. We also recognize and value the role that high-quality charter schools can play in providing families with educational choices. Our concern is ensuring a fair and equitable playing field for all public schools, particularly during a period of declining enrollment. This is not about opposing choice or competition; it is about ensuring that competition occurs on a level playing field and that the long-term interests of all students, Nevada taxpayers and public schools are appropriately considered.

This amendment is not a modest programmatic adjustment. It is a request to create a second K-12 campus, add approximately 1,600 new seats, expand into high school grades, construct a \$50-\$55 million facility on leased agricultural land located within a flood-prone area, assume decades of debt obligations, and increase annual payments to a private for-profit management company from approximately \$494,000 to more than \$1.24 million per year. Yet despite the extraordinary scope of the proposal, key components of the application remain unsupported, speculative, incomplete, or deferred for future consideration. SPCSA cannot fulfill its oversight responsibilities by approving the project first and assuming compliance will follow later. The law requires that these questions be answered before approval is granted.

The Board respectfully submits that public education dollars must be invested where there is demonstrated need, proven financial feasibility, meaningful transparency, and a clear benefit to all students. Those standards exist to protect students, families, taxpayers, and the long-term integrity of Nevada's public education system. Based on the record before it, SPCSA cannot reasonably conclude that those standards have been met. Accordingly, and for all of the reasons set forth above, the Washoe County School District Board of Trustees respectfully urges the State Public Charter School Authority to deny DANN's Request for Amendment in its entirety. Doing so would not prevent DANN from pursuing future opportunities through a legally compliant process supported by adequate evidence, actual community need that is not already addressed, and public accountability.

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SPCSA Board Members

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September 8, 2026

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It would simply ensure that an expansion of this magnitude is approved only when the applicant has satisfied the burden that Nevada law requires and that Nevada students and taxpayers deserve.

Sincerely,

/s/ Adam Mayberry

Adam Mayberry, President
Washoe County School District
Board of Trustees

cc: Washoe County
City of Sparks
Regional Transportation Commission (RTC)
TMWA
NV Energy
Truckee Meadows Flood Management Authority
U.S. Army Corp
NDOT
Truckee Meadows Regional Planning Agency (PRS)
City of Reno